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**From:** "Mike LaBonte" <mike@labonte.com>  
**To:** <sgarner@fcc.gov>  
**Date:** 8/1/02 10:38AM  
**Subject:** high speed access availability

Hi Steve,

I hope you don't mind unsolicited feedback on an FCC document, or can forward this to someone who might be able to use it. In the 3rd report on high speed internet access FCC 02-33, I question the methods used in some paragraphs that report availability statistics high speed cable and DSL service. For example:

105. Investment trends indicate that service providers continue to focus investments on the residential market, and that service providers are deploying new facilities capable of supporting advanced services for residential and small business consumers. Since the Second Report, our data demonstrate that new facilities have expanded the reach of advanced telecommunications and the percentage of zip codes with high-speed lines in service has jumped from 60 percent to 78 percent.(258)

If a zip code shows evidence that it has any high speed internet access at all, is it's entire population counted as having residential access available, or is some scaling applied? For example, I live in Haverhill MA, a city of about 60,000. Our cable system does not offer internet service, but Verizon offers DSL to the central area of the city. I believe DSL is available to less than 75 percent of the homes, as there are a significant number of homes beyond the range that Verizon is willing to service, even with the availability of DSL extenders. If this is typical then the actual availability of residential high speed access may be at least a few percent lower than 78 percent, depending on the set of communities without cable internet access and the percentage of homes in those communities that lie beyond the range of DSL. There may also be cable plants that do not provide 100% access, but I suspect these would be few.

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